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Michael Baly III  
President

May 25, 1994

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EX PARTE

William F. Caton  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

RECEIVED

MAY 27 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

RE: PR Docket 93-61; Amendment of Part 90 of the Commission's Rules to  
Adopt Regulations for Automatic Vehicle Monitoring Systems

Dear Mr. Caton:

The American Gas Association<sup>1</sup> (A.G.A) is submitting the following information as a result of discussions that have been held with FCC staff. In meetings, which have been memorialized by Counsel on behalf of Washington Gas,<sup>2</sup> A.G.A. noted that gas utilities have invested significant financial resources in Automated Meter Reading (AMR) systems. Most of these systems rely on continued use of the 902-928 MHz radio frequency. These devices also allow utilities to provide cost-effective service to millions of customers. As we indicated in our discussions, we have been surveying members to develop a profile of the industry's investment in AMR systems. The purpose of this correspondence is to submit the data that we have compiled with respect to 19 of our member companies that operate systems in the 902-928 MHz range.

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<sup>1</sup>A.G.A. represents 275 local distribution and transmission companies servicing 90 percent of the natural gas delivered in the United States. Many distribution companies throughout the country have made a sizable investment in telecommunications systems that could be adversely impacted by the Commission's proposal in this docket. Twenty-one gas utilities, many of which are A.G.A., members previously filed comments in this matter on March 21, 1994. Until this point, A.G.A. has not filed separate comments, but we fully strongly support the comments and concerns raised by these utilities.

<sup>2</sup>See Letter dated received May 17 and letter sent May 20 from Prudence Parks, Counsel for Washington Gas, to Secretary Caton describing the meetings between FCC personnel and gas industry representatives.

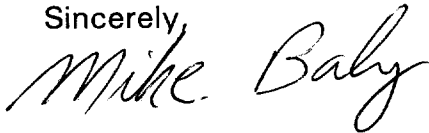
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The attached chart indicates that our industry already has spent in excess of \$125,000,000 on implementing AMR systems, with some two million customers being served by these devices. Many utilities already have received approval from their state public utility commissions to install large numbers of additional AMR devices. As shown in the attached chart, installation of these additional units represents more than a \$290,000,000 investment. When these units are installed, over six and half million utility consumers will be serviced using AMR devices. This, however, is not an exhaustive list of the natural gas companies that have invested in AMR systems. As we receive additional data, we will submit it to the docket.

Sincerely,

A handwritten signature in cursive script that reads "Mike Baly". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Michael Baly III

Enclosure (1)

# AMERICAN GAS ASSOCIATION REVIEW OF GAS UTILITY AMR DATA SYSTEMS

Name of Company	No. of Customers	Future Customers	Current Investments	Forecasted Investments	Rate-Base	Investor Finance
Atlanta Gas Light Company	430,000	470,000	\$30,000,000	\$35,000,000	yes	no
Baltimore Gas & Electric Co.	934	500,000	\$800,000	\$35,000,000	uncertain	uncertain
Bay State Gas Company	100,000	uncertain	uncertain	uncertain	uncertain	uncertain
Berkshire Gas, MA	203	33,301	\$82,000	\$3,658,000	no	yes
Boston Gas Company	285,000	200,000	\$20,000,000	\$10,000,000	yes	no
Brooklyn Union Gas Co.	190,000	248,000	\$8,000,000	\$13,000,000	yes	no
Citizens Gas & Coke Utility	1,000	50,000	\$372,000	\$4,000,000	yes	no
Columbia Gas Distribution Companies	600	500,000	\$300,000	\$15,000,000	yes	no
Commonwealth Gas Co.	100,000	450,000	\$6,000,000	\$33,000,000	yes	no
Connecticut Natural Gas	0	145,000	\$0	\$12,000,000	uncertain	uncertain
Consolidated Edison	1,500	50,000	\$600,000	\$5,000,000	yes	no
Minnegasco	378,605	111,000	\$21,977,000	\$9,000,000	yes	no
Peoples Gas Light and Coke Company	80,000	770,000	\$6,000,000	\$54,000,000	no	yes
Peoples Natural Gas Company, IA	70,000	uncertain	\$4,000,000	uncertain	yes	no
Philadelphia Gas Works	35,000	500,000	\$1,500,000	\$27,400,000	yes	no
Providence Gas	1,000	160,000	\$200,000	\$12,100,000	yes	no
Southern California Gas Company	2,000	80,000	uncertain	\$5,000,000	yes	yes
Washington Gas Light	190,000	210,000	\$14,250,000	\$15,750,000	yes	no
Yankee Gas Services Co.	184,000	186,000	\$13,400,000	\$1,950,000	yes	no
Totals	2,049,842	4,663,301	\$127,481,000	\$290,858,000		
Averages	98,202	245,437	\$6,709,526	\$15,308,316		

## Notes:

- This is a preliminary review of gas utility investment in AMR systems in the frequency at issue.
- It is not an exhaustive list of companies using AMR systems.
- These figures are estimates.
- In some cases, the totals probably are low given that some companies did not provide complete data.

Date Prepared: 25-May-94